

25-MJ-4073-DHH

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, JAMES D. SMITH, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am an Inspector with the Arlington Police Department, and I have served as a full-time employee there since April 2000 and in the Criminal Investigation Bureau Unit since 2013. Since April 2013, I have been assigned as a Task Force Officer (“TFO”), defined as a sworn Special Federal Officer, with the Federal Bureau of Investigation (“FBI”). As an FBI TFO, I am authorized to investigate violations of the laws of the United States, including violations of various federal sex trafficking laws. I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant.

2. While employed at the Arlington Police Department, I have investigated numerous state law violations, including but not limited to drug offenses, the sexual exploitation of children, and the trafficking of adults and minors. I have served as a TFO in the FBI Boston’s Human Trafficking and Child Exploitation Task Force since August of 2013. As a member of that investigative unit as well as the federal task force, I have participated in a number of state and federal investigations concerning narcotics distribution, fugitive apprehension, sexual exploitation of children, and the human trafficking of minors and adults. A number of those investigations involved obtaining search warrants and resulted in the arrest and conviction of multiple individuals.

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3. This affidavit is submitted in support of a criminal complaint charging IBRAHIM ABDUL-ALIM BIN HAJJ YAHYAABDUL-MALIK (YOB 1988) (hereinafter, “MALIK”), with sex trafficking a minor in violation of 18 U.S.C. § 1591(a)(1).

4. As described below, there is probable cause to believe that in December 2024, MALIK recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited a minor female victim (hereinafter, “Minor Victim 1”) to engage in commercial sex acts¹ knowing or in reckless disregard of the fact that Minor Victim 1 had not attained the age of 18 years.

5. The facts in this affidavit come from my personal observations and review of records, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause to secure a criminal complaint and does not set forth all of my knowledge about this matter. All dates and times are approximate.

PROBABLE CAUSE

6. On December 11, 2024, investigators received information from the National Center of Missing and Exploited Children (“NCMEC”) indicating a minor was possibly being sexually exploited in Boston, Massachusetts on www.megapersonals.eu.² NCMEC provided

¹ The term commercial sex act means any sex act on account of which anything of value is given to or received by any person.

² Based on my training and experience, I know that Megapersonals.eu and other similar websites, such as SkiptheGames.eu, Adultfriendfinder.com, and previously, Backpage.com, are sites on which sex traffickers and others post photos of people who are available to perform commercial sex acts. These commercial sex advertising websites are viewable inside and outside of the state of Massachusetts.

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investigators with a contact telephone number (hereinafter, “Telephone 1”)³ and a picture of Minor Victim 1 (who is currently 17 years old). Investigators determined that Victim 1 had been previously reported missing from her home in Columbus, Ohio, in August 2024; on or about October 9, 2024, law enforcement recovered Victim 1 in Los Angeles, California.

7. In December 2024, investigators conducted a search on www.megapersonals.eu and selected advertisements posted for Boston, Massachusetts. Investigators located an advertisement posted on Megapersonals.eu on or about December 11, 2024 which contained four photos of Minor Victim 1 posing in lingerie and sexually suggestive positions. Telephone 1 is listed as the number for sex buyers to use to arrange a commercial sex encounter with Minor Victim 1.

8. Law enforcement responded to the advertisement in an undercover capacity and initiated text communication with Target Telephone 1. Several text messages were exchanged between the undercover investigator (“UC”) and Target Telephone 1 discussing sex acts for a fee. For example:

To	From	Message
Telephone 1	UC	Hey bby u available later?
UC	Telephone 1	Yes babe how long would you like to see me
Telephone 1	UC	like 30 or hr?
Telephone 1	UC	depends how much
UC	Telephone 1	250/300

³ I am aware of the telephone number used by Telephone 1 but am omitting the number here to protect Minor Victim 1’s privacy and safety.

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Telephone 1	UC	K
Telephone 1	UC	so prob a hr
Telephone 1	UC	when u available? i am getting out of work in a few
UC	Telephone 1	Yes babe

9. Based on my training and experience, I understand that when Telephone 1 responds “250/300” to an inquiry concerning cost the numbers refer to the price for the commercial sex date (namely, \$250 for half an hour or \$300 for an entire hour).

10. The conversation between the UC and Telephone 1 continued to discuss additional logistics concerning the commercial sex date. For example:

To	From	Message
Telephone 1	UC	can u come back 2 Brookline?
UC	Telephone 1	No
UC	Telephone 1	You send Uber
UC	Telephone 1	Yes
Telephone 1	UC	damn from Cambridge?
Telephone 1	UC	wat address so i see how much?
UC	Telephone 1	[Hotel address], Cambridge, MA 02138
Telephone 1	UC	let me see if i can get a telly ⁴ closer
Telephone 1	UC	they are expensive

⁴ Based on my training, experience, and familiarity with this investigation, I understand that “telly” is slang for a hotel.

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UC	Telephone 1	Yeah
Telephone 1	UC	im gonna try and get a room at [hotel].

11. Based on my training, experience, and familiarity with this investigation, I understand this series to communications to refer to efforts to agree upon a location for the anticipated commercial sex acts.

12. In subsequent communications, the UC finalized a hotel at which to meet. On December 11, investigators with the FBI Human Trafficking and Child Exploitation Task Force made contact with Minor Victim 1. Investigators searched Minor Victim 1 and located an iPhone 14 and two Trojan Magnum condoms in her possession. Investigators placed a call to Telephone 1 (the number used for the above-referenced communications with the UC) and the Minor Victim 1's iPhone rang displaying the telephone number of the UC. The iPhone was seized as evidence; investigators subsequently obtained a search warrant to review an extraction of the phone.

Interview with Minor Victim 1

13. Minor Victim 1 initially gave investigators a name that was something other than what I know her true name to be. She also stated that she was not forced to engage in commercial sex and learned to post commercial sex advertisements from "the streets."

Commercial Sex Acts and Identification of MALIK

14. While reviewing content in the extraction of Minor Victim 1's cellular telephone, investigators observed multiple photographs that matched the photographs contained in Victim 1's commercial sex advertisements.

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15. Investigators also observed a number of electronic message communications between Minor Victim 1 (using Telephone 1) and an individual utilizing telephone number (XXX) XXX-0188 (hereinafter, “Telephone 2”). Based on my training, experience, and familiarity with this investigation, I am aware that Telephone 2 was in contact with multiple telephones used by Minor Victim 1. Telephone 2 has also been associated with one of MALIK’s brothers as well as a business owned by MALIK (“Ibrahim’s Halal Chicken and Waffles”).

16. By at least November 13, 2024, communications between Telephone 1 and Telephone 2 show that MALIK was trafficking Minor Victim 1. On that date, Telephone 2 sent a screenshot of text communications with a sex buyer to Telephone 1. The screenshot displayed the following text communications:

Incoming: “And what color is the panties u r going to wear hun”
 Incoming: “And do u have a silk bra with no padding or wires init”
 Incoming: “We still on right”
 Incoming: “U have a friend with u too baby”
 Outgoing: “Yeah just wait on deposit to confirm”
 Incoming: “U have a friend with u”
 Incoming: “And u r going to do a face time with me first hun”
 Outgoing: “+1 [Telephone 1]”

17. Shortly after sending the screenshot to Telephone 1, MALIK texted “The [customer] want face for deposit.” Numerous subsequent communications between Telephone 1 and Telephone 2 document MALIK’s trafficking of Minor Victim 1, often including names of sexual services (“bbbj”), prices per half-hour or hour (e.g., “200hhr 300 hr”), and references to a trick’s arrival (“He here”; “Let him in”; “About to let this trick upstairs”) and departure (“Done”).

18. For example, on November 17, 2024, Minor Victim 1 wrote, “Letting him in” followed by, “Zelle lmk.” Based on my training, experience, and familiarity with this investigation,

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I believe that Minor Victim 1 was asking MALIK to let her know what Zelle account (a payment application) to tell the sex buyer to use to send payment. MALIK responded “XXX-XXX-8120” and “Yeah.” Ten minutes later, Minor Victim 1 responded, “Done.” MALIK immediately wrote back, “Okay” and, two minutes later, “You got condoms.” Minor Victim 1 answered, “Only two more.” Based on my familiarity with this investigation, I am aware that Zelle records for “XXX-XXX-8120” show the account received a payment of \$200 on November 17, 2024. I am also aware that the XXX-XXX-8120 Zelle account is registered to a woman (hereinafter, “Female 1”) associated with MALIK and one of his brothers.⁵

19. Likewise, on November 18, 2024, MALIK wrote, “Somebody’s here another quickie for 200 do you have condoms?” Minor Victim 1 replied, “yea I bought sum earlier” and MALIK answered, “OK, I sent him.” Several minutes later, Minor Victim 1 asked: “How much did u tell him” and MALIK responded “200.” Shortly thereafter, Minor Victim 1 wrote, “Zelle lmk” and “?”; based on my training, experience, and familiarity with this investigation, I believe that Minor Victim 1 was asking for a Zelle account to use to receive payment for the commercial sex act and confirmation from MALIK that payment had been received. MALIK replied, “Got it” and four minutes later, Minor Victim wrote, “Done.” Based on my training, experience, and familiarity with this investigation, I believe that meant she had completed the commercial sex act with the customer. Zelle records for “XXX-XXX-8120” account show receipt of payment of \$200 on November 18, 2024.

⁵ I am aware of Female 1’s true name but am omitting it here to protect her privacy.

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20. Based on the investigation to date, I believe MALIK was trafficking Minor Victim 1 in other states (including Pennsylvania) and that she travelled to Massachusetts sometime in early December 2024. On December 2, 2024, MALIK wrote Minor Victim 1 that he had “changed the age to 20 on all the ads.” Based on my training, experience, and familiarity with this investigation, I believe MALIK was referring to the various posted commercial sex advertisements depicting Victim 1 on various websites, including Megapersonals.com and Eros.com⁶ and that MALIK raised Minor Victim 1’s listed age on those websites to indicate that she was 20 years old in order to avoid law enforcement scrutiny of advertisements with younger ages.

21. As a part of this investigation, I and other investigators also obtained records of MALIK’s air travel. Records show that MALIK obtained tickets for a flight from San Jose, California, to Boston, Massachusetts (with a layover in Denver, Colorado) on December 4, 2024. The tickets listed MALIK’s contact telephone as Telephone 2. MALIK (using Telephone 2) wrote Minor Victim 1 (using Telephone 1) “On plane” and “Still on plane.” The manifest for the flights show that MALIK travelled from San Jose to Boston on December 4, 2024.

22. MALIK also sent an address to Minor Victim 1. That address matched an auto body shop in Revere, Massachusetts. Based on my training, experience, and familiarity with this investigation, I am aware that records obtained from that shop show that in the early morning of December 5, a 2019 Green Buick Encore bearing Massachusetts plate 3FVM92 was rented to MALIK. Later that day (December 5), MALIK used Telephone 2 to send a photograph of a green

⁶ Based on my training and experience, I know that Eros.com is a website in which sex traffickers and others post photos of people who are available to perform commercial sex acts. These commercial sex advertising websites are viewable inside and outside of the state of Massachusetts.

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vehicle to Telephone 1. In the photograph, the license plate of the green vehicle is visible and read “3FVM92.”

23. Also on December 5, Minor Victim 1 asked MALIK for a credit card to use to order food, writing “What card can I order food with.” Based on my training, experience, and familiarity with this investigation, I am aware that victims of human trafficking are frequently required to give all of the proceeds of commercial sex acts to their traffickers, or the proceeds are transmitted directly from the commercial sex buyers to the traffickers. Accordingly, the victims typically need to ask their traffickers’ permission to gain access to money they have earned to pay for even basic needs such as food and shelter (that is, paying for meals and hotels). MALIK responded with a credit card number and then an image of the credit card itself, the typed-out credit card number, the expiration date, and the CVC number. The name on the credit card is “Ibrahim Malik.”

24. On December 8, 2024, Minor Victim wrote, “Letting him in 180”; “Zelle lmk”; “Got it ?” Based on my training, experience, and familiarity with this investigation, I believe that Minor Victim 1 was letting MALIK know that she was letting a sex buyer into the room, that client sent \$180 to the Zelle account, and that she wanted confirmation that the money had been received. MALIK responded “Ok” and “Yes 180”. Roughly twelve minutes later, Minor Victim 1 wrote, “I told him his time up he not tyrnna leave” and then “He bta send another 100”; “Lmk”; and, after another five minutes, “Done.” Based on my training, experience, and familiarity with this investigation, I believe that Minor Victim 1 told the client his time was over but he resisted leaving, and then indicated that he was sending additional money. The Zelle records for the XXX-XXX-

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8120 account show receipt of \$180 followed by another \$100 15 minutes later from the same sender.

25. Investigators learned that on or around December 9, 2024, Minor Victim 1 checked into a room at The Overlook at St. Gabriel's in Brighton, Massachusetts.⁷ In particular, Minor Victim 1 attempted to check into room 2632 there under the name "[Female 1]" on December 9, 2024, around 2:00 p.m. The concierge initially denied Minor Victim 1's request to check in because Minor Victim 1 did not resemble the identification associated to the reservation and because she could not provide a physical copy or photo of the identification on the reservation. After receiving further instructions from the Airbnb host, Minor Victim 1 was permitted to check in to a different room at approximately 3:27 p.m.

26. Investigators subsequently reviewed video surveillance from The Overlook at St. Gabriel's taken on December 9, 2024. At approximately 3:59 PM, Minor Victim 1 left the lobby, approached a green mid-sized SUV parked outside, and collected luggage from the trunk of the vehicle. That vehicle was consistent in appearance with the vehicle depicted in the photograph MALIK had previously sent to Minor Victim 1 on or about December 5, 2024.

27. In the surveillance video, the Minor Victim 1 re-entered the lobby. At approximately 4:01 p.m., a male exited the driver's side door of the same green vehicle and collected additional items from the trunk. The male then entered the same lobby. At approximately 4:13 p.m., the male and Minor Victim 1 waited near the elevators inside the building and enter the

⁷ Based on my training, experience, and familiarity with this investigation, I understand that The Overlook at St. Gabriel's in Brighton, Massachusetts is a building complex that has apartments available to Airbnb for short-term rentals.

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elevator together. At approximately 4:27 p.m., the male left the lobby, returned to the green vehicle and drove away from The Overlook at St. Gabriel's.

28. Investigators obtained the driver's license photograph for MALIK. Based on my review of the video footage from The Overlook at St. Gabriel's, the male observed in the video footage driving the green vehicle and accompanying Minor Victim 1 in the elevator matched the individual depicted in MALIK's driver's license photo.

29. Shortly thereafter, on or about December 9, 2024, MALIK and Minor Victim 1 had an extensive communication discussing commercial sex acts via electronic communications.

From	Message
Telephone 1 (Minor Victim 1)	Walking him up
Telephone 2 (MALIK)	Ok
Telephone 1 (Minor Victim 1)	He asking for GFE and bb
Telephone 1 (Minor Victim 1)	Zelle lmk
Telephone 2 (MALIK)	Ok
Telephone 1 (Minor Victim 1)	Got it ?
Telephone 2 (MALIK)	Yeah
Telephone 1 (Minor Victim 1)	Do I just leave out or what
Telephone 2 (MALIK)	Got it
Telephone 1 (Minor Victim 1)	?
Telephone 2 (MALIK)	He wants all that for 150
Telephone 1 (Minor Victim 1)	Yes
Telephone 2 (MALIK)	No
Telephone 2 (MALIK)	Lol

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Telephone 1 (Minor Victim 1)	No what
Telephone 2 (MALIK)	regular 150 is just a blow and go
Telephone 1 (Minor Victim 1)	He wouldnt give the money I had to tell him yeah so I could get it
Telephone 2 (MALIK)	Oh ok Are you guys in the room?
Telephone 1 (Minor Victim 1)	Yes
Telephone 2 (MALIK)	I'm coming up now
Telephone 1 (Minor Victim 1)	Ok I'm telling him no now he's using google translate
Telephone 2 (MALIK)	Ok
Telephone 2 (MALIK)	Lmk
Telephone 2 (MALIK)	Just tell him if he doesn't do it then I'll get them out.
Telephone 1 (Minor Victim 1)	He's leaving
Telephone 2 (MALIK)	Is he naked?
Telephone 1 (Minor Victim 1)	No
Telephone 1 (Minor Victim 1)	He wants the money back
Telephone 1 (Minor Victim 1)	He's not leaving
Telephone 1 (Minor Victim 1)	Hes just standing here he won't go
Telephone 1 (Minor Victim 1)	U good?

30. Based on my training, experience, and familiarity with this investigation, I believe that Minor Victim 1 let MALIK know that she was bringing a commercial sex buyer up to a hotel room (“Walking him up”) and that he was asking for additional sexual services (“He asking for GFE and bb”), specifically, a “girlfriend experience” (meaning kissing with additional time and attention) and “bare back” (sexual activity without a condom). I further believe that Minor Victim

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1 told MALIK that the customer used Zelle to send money to MALIK and wanted MALIK to let her know that the money transfer had occurred (“Zelle lmk” and “Got it ?”). Once MALIK received the money transfer (“Yeah”), Minor Victim 1 asked for instructions regarding the customer’s additional requests (“Do I just leave out or what”). MALIK asked whether that the customer wanted those additional services for \$150 (“He wants all that for 150”), and when Minor Victim 1 confirmed that he did (“Yes”), MALIK rejected the proposal (“No” and “Lol”), insisting that \$150 was payment for nothing more than oral sex and then a quick departure (“regular 150 is just a blow and go”). Based on my training, experience, and familiarity with this investigation, I believe that what followed was MALIK’s threatening to come up to the room if the customer did not leave (“I’m coming up now” and “Just tell him if he doesn’t do it then I’ll get them out”) and, after initially thinking the customer was leaving, Minor Victim 1 reported that the customer wanted his money back and was refusing to leave (“He wants the money back”; “He’s not leaving”; and “Hes just standing here he won’t go”). During the roughly five-minute break in texts that then followed, I believe that MALIK entered the room and removed the customer, possibly by force, causing Minor Victim 1 to subsequently ask whether MALIK had been hurt (“U good?”). Based on my review of Zelle transaction records for XXX-XXX-8120, I understand that a payment of \$150 was made to that Zelle account.

31. As described above, investigators in Boston made contact with Minor Victim 1 on December 11, 2024. Flight records show that MALIK obtained a ticket with a scheduled departure time from Boston, Massachusetts to San Jose, California (with a layover in Chicago) of approximately 6 a.m. the next morning (Dec. 12, 2024)—that is, just after investigators made contact with Minor Victim 1. MALIK’s flight records again list Telephone 2 as his contact number.

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Based on my training, experience, and familiarity with this investigation, I believe that MALIK remained in physical proximity to Minor Victim 1 in order to exercise control over her and to ensure that she continued to engage in commercial sex acts, and that after she was recovered by law enforcement, MALIK fled the Boston area as soon as possible.

32. At the time Minor Victim 1 was in Boston, she was 17 years old.

33. In late February, investigators learned that Minor Victim 1 left the residential program where she had been living in Ohio. On March 4, 2025, investigators obtained information that Minor Victim 1 was back with MALIK in California.

CONCLUSION

34. I believe that the MALIK engaged in sex trafficking of a minor by sending Minor Victim 1 on “dates” while she was under 18 years of age and further that he benefitted financially by trafficking her.

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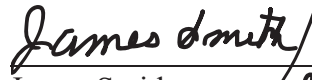
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35. Based on the foregoing, I submit there is probable cause to believe that in December 2024, MALIK committed sex trafficking of Minor Victim 1 when she was a minor in violation of Title 18, United States Code, Section 1591(a)(1).


James Smith
Task Force Officer
Federal Bureau of Investigation

Signed electronically and sworn to before me by teleconference in accordance with Fed. R. Crim. P. 4.1 on March 5, 2025.

1:19 p.m.


HONORABLE DAVID H. KENNEDY
UNITED STATES MAGISTRATE JUDGE

